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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
) **DECLARATION OF SABRINA MEDLER**
) **IN SUPPORT OF PLAINTIFF MARK**
) **SNOOKAL'S MOTION FOR**
) **ATTORNEYS' FEES AND COSTS**
)
) *[Filed concurrently with Plaintiff Mark*
) *Snookal's Notice of Motion and Motion for*
) *Attorneys' Fees and Costs; Tables 1 and 2 to*
) *Plaintiff's Motion for Attorneys' Fees and*
) *Costs, Declarations of Dolores Y. Leal, Olivia*
) *J. Flechtsig, Renee Mochkatel, Karis Stephen,*
) *J. Bernard Alexander, Lisa Bloom, Tamara*
) *Freeze, and Mark Snookal; and [Proposed]*
) *Order Granting Plaintiff's Motion for*
) *Attorney's Fees and Costs]*
)
) Action Filed: August 3, 2023
) Trial Dates: August 19-25, 2025
) Judgment Entered: September 3, 2025
)
) Date: November 13, 2025
) Time: 10:00 a.m.
) Crtrm: 5B
)

DECLARATION OF SABRINA MEDLER

I, SABRINA MEDLER, declare as follows:

1. I am an attorney duly licensed to practice before all of the Courts of the State of California, and I have been an active member of the California State Bar since December 2024. If called as a witness, I could and would competently testify to the following facts based upon my own personal knowledge.

2. This declaration is being submitted in support of Plaintiff Snookal's Motion for Attorneys' Fees and Costs pursuant to Government Code §12965(b).

3. I am an Associate in the law firm of Allred, Maroko & Goldberg in Los Angeles, California. A substantial part of our practice is plaintiff employment litigation that focuses on litigating and trying complex civil rights and employment matters. Our firm litigates individual matters and multi-plaintiff cases in these areas.

4. I have been employed with Allred, Maroko & Goldberg since 2023, initially as a law clerk and then as an Associate Attorney upon my admission to the California Bar in December 2024. During my tenure, I have worked on numerous employment cases, representing plaintiffs in matters involving discrimination, sexual harassment, and wrongful termination. Although I have not yet taken a case to trial, I have successfully resolved many matters through alternative dispute resolution, both prior to, and after instituting litigation.

5. I am a member of the California Employment Lawyers Association ("CELA"), as well as a member of the CELA Diversity Outreach Committee. I am also a member of the Los Angeles County Bar Association's ("LACBA") Labor and Employment Law section, as well as a member of the LACBA Saturday Seminar Committee.

6. Over 90% of our cases are taken on a contingency basis. Through my practice, I have become familiar with the rates charged by law firms in Los Angeles County for litigation of employment-related matters such as this case. Based on that knowledge, and my knowledge of the experience level and/or abilities of Plaintiff's counsel, it is my professional opinion that the rates sought by our firm are well within the range charged by comparably qualified attorneys for similar litigation. These hourly rates are reasonable and consistent with fees being charged

1 by Plaintiff trial attorneys in employment cases with commensurate skill level, expertise and
2 experience.

3 7. Based on my experience in the field, employment cases are by nature risky and
4 expensive to litigate. Recovery is never assured. Cases often take years to resolve. My clients
5 are invariably unable to pay my legal fees and costs which, in cases I participate in and try,
6 almost always approach or break into seven figures. In order to maintain a viable private
7 practice, I must place a premium on assessing a case from the perspective of trial costs versus
8 the legal merits and the expected recovery. In cases where damages may be lower, or difficult to
9 obtain, I examine the possibilities of fee-shifting statutes, should I prevail. My hourly rate is
10 \$450 per hour.

11 8. As set forth in Ms. Leal's Declaration, filed concurrently herewith, my total hours
12 in the case were 36.9 at the rate of \$450 per hours for a total request of \$16,605. I have
13 reviewed my billing as reflected in Exhibit A to Ms. Leal's declaration, and it is accurate.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct and, if called to testify, I could and would competently testify to the
16 above facts.

17 Executed this 17th day of September, 2025, at Los Angeles, California.

18
19 
20 _____
21 SABRINA MEDLER